BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

In the Matter of

DOCKET NO. 2008-0274

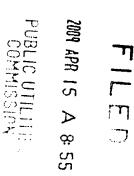
PUBLIC UTILITIES COMMISSION

Instituting a Proceeding to Investigate
Implementing a Decoupling Mechanism for
Hawaiian Electric Company, Inc., Hawaii
Electric Light Company, Inc., and Maui
Electric Company, Limited

BLUE PLANET FOUNDATION'S RESPONSE TO THE DIVISION OF CONSUMER ADVOCACY'S INFORMATION REQUESTS DATED APRIL 6, 2009

AND

CERTIFICATE OF SERVICE



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Blue Planet Foundation ("Blue Planet"), by and through its attorneys Schlack Ito Lockwood Piper & Elkind, hereby responds to the Division of Consumer Advocacy's Information Requests dated April 6, 2009.

CA/BPF-IR-1

In its March 30 Initial Statement of Position at page 6, BPF states, "Blue Planet favors a more formal quid pro quo arrangement for several reasons." Please describe and explain <u>each</u> element of the "more formal quid pro quo" that is being recommended by BPF, indicating each metric to be employed and how performance relative to each metric would be scored and translated or applied for ratemaking purposes to accomplish the desired, "...linking [of] these commitments to RAM benefits."

RESPONSE:

At this time, Blue Planet recommends further consideration by the parties to this proceeding of the following potential performance metrics: (1) the number of new net energy metered customers interconnected to the system during the year; (2) the increase in nonfossil-based kilowatt-hour generation during the year; (3) the increase in the number of customers

signed up in the Pay-as-You-Save Solar Program during the year; (4) the amount of new renewable energy (kilowatt-hours) purchased through the feed-in tariffs during the year; (5) the decrease in the amount of fossil oil used during the year; and (6) the increase in the energy savings (kWh) resulting from energy efficiency programs and demand-side programs. Blue Planet and the parties may identify additional performance metrics in the course of this proceeding. At this time, Blue Planet has not developed a mechanism for linking performance under such metrics to any Revenue Adjustment Mechanism benefits.

CA/BPF-IR-2

In its March 30 Initial Statement of Position at page 6, BPF states, "Blue Planet favors a more formal quid pro quo arrangement for several reasons." Please provide a schedule listing and quantifying each of the "commitments" that BPF believes should be linked into RAM rate adjustments in each available future year.

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

CA/BPF-IR-3

Please provide specifics illustrative calculations that BPF has developed to show how future HECO performance relative to the "commitments" listed in your response to CA/BFP-IR-2 should be linked into the RAM mechanism.

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

CA/BPF-IR-4

Please provide complete copies of all calculations, spreadsheet files, workpapers, surveys and other documents associated with each of the efforts described in your responses to CA/BPF-IR-1 through CA/BFP-IR-3 of this information request.

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

CA/BPF-IR-5

To the extent not provided in response to CA/BPF-IR-1 through CA/BFP-IR-4, above, please provide complete copies of all other calculations, spreadsheet files, workpapers, surveys, documentation and other analyses supporting the conclusions and recommendations stated in your Initial Statement of Position.

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

DATED: Honolulu, Hawaii, April 15, 2009.

DOUGLAS A. CODIGA

Attorney for Blue Planet Foundation

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date a copy of the foregoing document was duly served upon the following individuals by placing a copy of same in the United States Mail, postage prepaid, and/or by electronic service, as follows:

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DATED: Honolulu, Hawaii, April 15, 2009.

DOUGLAS A/CODIGAY

Attorney for Blue Planet Foundation